

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

_____)	
WYETH, a Delaware corporation,)	
)	
Plaintiff,)	
)	
vs.)	C.A. No. 06-663-SLR
)	
CORDIS CORPORATION, a Florida)	
corporation,)	
)	
Defendant.)	
_____)	

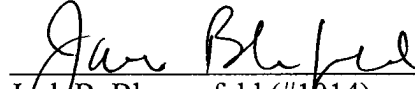
**NOTICE OF DEPOSITION PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), the Plaintiff Wyeth shall take the deposition by oral examination of Cordis Corporation (the "Defendant" or "Cordis"), by one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf with respect to each of the matters described with particularity in Attachment A hereto. The deposition will begin on January 16, 2007, at 9:00 a.m., or at a date and time otherwise agreed to by the parties, and will be held at the offices of Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market Street, Wilmington, Delaware 19801.

The Defendant is obligated under Rule 30(b)(6) to designate those persons who shall testify as to matters known or reasonably available to the Defendant about each of the matters specified in Attachment A. Wyeth requests that the Defendant provide it with written notice, at least five (5) business days in advance of the deposition, of: (1) the name and employment position of each designee who will testify as to the matters specified, and (2) the matters on which each such designee will testify.

The deposition shall be recorded by stenographic means before a Notary Public or other officer authorized by law and pursuant to the Federal Rules of Civil Procedure. The deposition will continue from day to day until completed with such adjournments as to time and place as may be necessary.

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December 5, 2006

ATTACHMENT A

The matters on which Wyeth requests testimony from Defendant are as follows:

1. The geographic location of the day-to-day business activities of Cordis, including where and how Cordis conducts its day-to-day business affairs.
2. The present location of each of Cordis's offices, facilities, operations and affiliated companies, and with respect to each such office, facility, operation or affiliated company:
 - a. a description of the employment responsibilities and duties of Cordis employees at that location;
 - b. the number of employees at that location;
 - c. the payroll amount on an annual basis for all employees at that location;
 - d. the amount (in dollars) of annual revenues and sales generated at that location;
 - e. the dollar value of the inventory at that location; and,
 - f. the value of real estate and/or tangible property at that location.
3. The geographic location of the following operations within Cordis, and information about the number of Cordis employees engaged in such activities, their responsibilities and the geographic location where they work:
 - a. research and engineering;
 - b. manufacturing and production;

- c. supervision of manufacturing and production;
 - d. sales and marketing;
 - e. payroll and human resources;
 - f. banking, financial activities and accounting;
 - g. medical affairs;
 - h. clinical affairs;
 - i. regulatory affairs; and,
 - j. personnel.
4. The location of Cordis's Corporate Headquarters during the period 2000 to the present.
 5. The location of all Cordis bank accounts and credit facilities within the United States, and the average annual balances of such accounts and facilities.
 6. The amount of taxes paid each year by Cordis to any state or municipality in the United States during the period 2000 to the present, and the basis on which any government or administrative authority within the states of Florida and New Jersey assessed such taxes on Cordis.
 7. The number of Cordis's U.S. employees who are exempt from the Fair Labor Standards Act (29 U.S.C. § 201 et seq.), and as to those employees, their geographic location and the nature of their duties.

8. The number, geographic location, and job titles or descriptions of all Cordis managers and executives at any level below the Cordis Franchise Global Management Board.
9. The corporate organization and structure of Cordis.
10. The relationship between Cordis and its parent corporation, Johnson & Johnson, including but not limited to the way in which that relationship affects the day-to-day business activities at Cordis.
11. The names, locations and job responsibilities of all individuals jointly employed by Johnson & Johnson and Cordis or who otherwise serve in a joint capacity with both Johnson & Johnson and Cordis.
12. The relationship between Cordis and its subsidiary corporations, including but not limited to the number and location of employees at any such subsidiary.
13. Information about all representations (including without limitation representations made to courts, to parties in litigation, to governments or government regulatory agencies, and/or to private parties) made by Cordis during the period 2000 through the present about Cordis's principal place of business, and the facts and circumstances supporting such representations.
14. The location of Cordis's principal place of business during the period 2000 to the present.

CERTIFICATE OF SERVICE

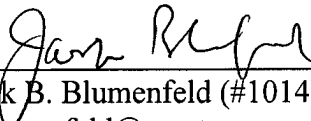
The undersigned hereby certifies that copies of the foregoing was served on
December 5, 2006 upon the following and in the manner indicated:

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